

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:		) Case No. 20-20646-GLT
		)
Kimberly A. Cline,		) Chapter 13
	Debtor,	)
		) Related to Claim No. 1
Kimberly A. Cline,		)
	Movant,	) Document No.
		) Related to Doc. Nos. 43
vs.		)
		)
MTGLQ Investors, L.P.,		)
	Respondent.	)
		)

**STIPULATION AND CONSENT ORDER FOR MEDIATION**

Consistent with the Court's Text Order dated July 1, 2021, and by the agreement of the parties it is hereby Ordered as follows:

1. The parties agree to the appointment of Norman Gilkey, Esquire to serve as the Mediator in this action.
2. The Mediator agrees to charge the parties at the rate of \$350 per hour, to be shared equally by the parties. The Mediator agrees to limit his fees to a total of \$3,500 unless additional amounts are approved by the parties after consultation with the Mediator or the Mediator advises the parties that he will perform the additional services in excess of \$3,500 on a pro bono basis.
3. The Debtor agrees to submit a loan modification application and a ledger of all payments to the Respondent by August 10, 2021.
4. The Mediation process will be conducted pursuant to the Local Rules of this Court. The Parties each acknowledge that persons with authority to resolve the matter must attend the mediation session.
5. The proposed Mediator has advised the parties, and through this Stipulation and Consent Order advises the Court, that in 2012 he represented a client which was adverse to the Respondent. The Mediator further advises that the matter was concluded years ago, he no longer represents that client and he has not again been adverse to the Respondent. Neither the parties nor the proposed Mediator see this as a reason for disqualifying the proposed Mediator from serving.

6. The Mediation is to be completed by September 30, 2021.

**DATED: 07/14/21**

/s/Francis E. Corbett  
Francis E. Corbett, Esquire PA ID #37594  
Mitchell Building - 707  
304 Ross Street  
Pittsburgh, PA 15219  
(412) 456-1882  
[fcorbett@fcorbettlaw.com](mailto:fcorbett@fcorbettlaw.com)

**DATED: 07/14/21**

/s/Denise Carlon  
Denise Carlon, Esquire PA ID #317226  
KML Law Group, P.C.  
2591 Wexford-Bayne Road, Suite 201  
Sewickley, PA 15143  
412-430-3589  
[dcarlon@kmlawgroup.com](mailto:dcarlon@kmlawgroup.com)

**DATED: 07/14/21**

/s/Norman E. Gilkey  
Norman E. Gilkey, Esquire PA ID #34310  
Babst Calland Clements & Zomnir, P.C.  
Two Gateway Center, 8th Floor  
Pittsburgh, PA 15222  
(412) 394-5626  
[ngilkey@babstcalland.com](mailto:ngilkey@babstcalland.com)

It is so Ordered.

Date: July 16, 2021

BY THE COURT:

  
\_\_\_\_\_  
Gregory Taddonio hct  
United States Bankruptcy Judge

In re:  
Kimberly A Cline  
Debtor

Case No. 20-20646-GLT  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0315-2  
Date Rcvd: Jul 16, 2021

User: lfin  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 3

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 18, 2021:

Recip ID	Recipient Name and Address
db	+ Kimberly A Cline, 6 Thompson Street, Finleyville, PA 15332-9435
	#+ Denise Carlon, Esq., KML Law Group, P.C., 2591 Wexford-Bayne Road, Suite 201, Sewickley, PA 15143-8676
	Norman E. Gilkey, Esquire, Babst Calland Clements & Zomnir, P.C., Two Gateway Center, 8th Floor, Pittsburgh, PA 15222

TOTAL: 3

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 18, 2021

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 16, 2021 at the address(es) listed below:

Name	Email Address
Brian Nicholas	on behalf of Creditor MTGLQ Investors L.P. bnicholas@kmlawgroup.com
Francis E. Corbett	on behalf of Debtor Kimberly A Cline fcorbett@fcorbettlaw.com fcorbett7@gmail.com
Maria Miksich	on behalf of Creditor MTGLQ Investors L.P. mmiksich@kmlawgroup.com
Office of the United States Trustee	ustpregion03.pi.ecf@usdoj.gov
Ronda J. Winnecour	

District/off: 0315-2

User: lfin

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Date Rcvd: Jul 16, 2021

Form ID: pdf900

Total Noticed: 3

cmecf@chapter13trusteedpa.com

S. James Wallace

on behalf of Creditor Peoples Natural Gas Company LLC ccfpeoples@grblaw.com Equitablebankruptcy@peoples-gas.com

TOTAL: 6